

From: Phil Qualls
To: Robert Daley
Date: Mon, Sep 9, 2002 8:49 AM
Subject: Re: Fwd: DRAFT "0" OF MANUAL ACTIONS RULE

MR2
Bob, we plan on doing so, probably multiple times. Currently, I do not see how symptom based procedures which include manual actions, meet III.G.2. I do not expect to see much in the way of symptom based procedures. The primary reason is the need to have available diagnostic instrumentation to see and properly respond to the symptom. The instrumentation would have to be unaffected by the fire effects.

The other questions will have to be addressed by meetings with the regional folks, ourselves and the various public shareholders.

>>> Robert Daley 09/05/02 09:50AM >>>
Phil,

You may not like my suggestion, but here it goes! I suggest that we (the NRC) hold some type of forum (a working group, for instance) with the industry on this before it's issued. The part of the rule that primarily needs to be talked about is "III.G.2.d.ii." This portion is extremely subjective and some type of guidance will have to be issued along with the rule. Just an example of some of the issues that immediately come to mind are as follows:

1. If symptom based procedures are used, how long should it take for an Operator to respond to the spurious operation? How many spurious operations should be assumed if symptom based procedures are used? Should more be assumed if the response time is greater?
2. What is a reasonable manual action? If manual actions are no longer prescriptive and are instead symptom based, what can be perceived as reasonable considering that the operator will have to respond to the spurious actuation much more quickly if the action is symptom based?
3. When procedures are written by the licensee, will there be a cut-off as to what needs to be prescriptive as opposed to symptom based? Will it be based on system importance to safe shutdown? i.e., Will the "required" systems and components always be covered by prescriptive procedures, and associated circuits be covered by symptom based procedures?
4. We will also have to be specific as to what type of procedures and training will be deemed as acceptable.
5. Also, the term "environmental acceptability" will have to be defined.

These are just some of the issues that come to me immediately. This is by no means meant to be an exhaustive list. But, if we don't be specific, and at the same time don't get some type of industry buy-in, I'm afraid that issuing this rule as written will make Appendix R virtually uninspectable (Is "uninspectable" a real word?).

Thanx for letting me get in my two cents worth? If you have any further questions, you know where to find me. Please keep me informed.

Thanx!

Bob Daley

MR2
>>> Phil Qualls 09/03/02 03:35PM >>>
Bob, Ron Langstaff is here this week and suggested that I send you a copy of this. Here is a DRAFT 0 of

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the planned rulemaking to Appendix R. I will undergo some comment and possible significant refinement but this is Eric's first cut. I can already sense that we need to limit this to manual actions on installed equipment - meaning NO repairs or NO modifications.